

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MELINDA SGARIGLIA,)	
)	1:19-cv-05684
Plaintiff,)	
)	
v.)	Honorable Judge Robert W.
)	Gettleman
AMERICAN INTERNATIONAL RELOCATION)	
SERVICES, LLC, D.B.A. AIRES, AN ILLINOIS)	
LIMITED LIABILITY CORPORATION,)	
NICHOLAS GONRING & KELLY GONRING.,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR EXTENSION OF TIME

NOW COMES the Plaintiff, Melinda Sgariglia, Inc., by and through her attorney, Carol Oshana of Oshana Law, and in support of her Motion for Extension and to reset the briefing schedule, states as follows:

FACTS

1. On June 20, 2019, Plaintiff Melinda Sgariglia filed her Complaint for a violation of the Residential Real Property Disclosure Act, 765 ILCS 77/35, Fraud and Breach of Contract in the Circuit Court of Cook County, Chancery Division.
2. Defendants moved the matter to the United States District Court for the Northern District of Illinois, Eastern Division.
3. On July 20, 2023, this honorable Court entered an Order requiring Plaintiff to file her Reply in Support of Motion and Responses to Cross Motions to be due on September 12, 2023 after filing a Motion for Extension.
4. Plaintiff’s counsel

5. Plaintiff's counsel has been diligently working on all Responses, additional 56.1 Statements and Replies. She has completed her Responses to Aires Motion for Summary Judgment and 56.1 statement, and those are filed.
6. Counsel needs 2 additional days to finish her responses for the remaining documents.
7. Due to the late hour, counsel did not have an opportunity to ask opposing counsels on whether they opposed this Motion.
8. Defendants will not be prejudiced by the delay.

WHEREFORE, for the foregoing reasons, Plaintiff, by and through her attorney, Oshana Law, respectfully requests that this Honorable Court grant Defendant an extension of 11 days to file her Reply in Support of Motion for Summary Judgment and Responses to Defendants' Motion, until September 14, 2023, the Defendants' Reply through October 5, 2023 and that all subsequent dates be adjusted accordingly.

Respectfully submitted,
MELINDA SGARIGLIA,

By: /s/ Carol Oshana
One of her attorneys

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September 12, 2023